



WILLIAMS, PORTER, DAY & NEVILLE P.C.
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March 21, 2023

National FOIA Office
U.S. Environmental Protection Agency
1200 Pennsylvania NW, Room 7309C
Washington, DC 20460
Sent Via Overnight Delivery

Re: Freedom of Information Act Request

To Whom it May Concern at the National FOIA Office for the U.S. EPA:

On behalf of Big Country Storage, LLC, a Wyoming Limited Liability Company, with its principal office located at 1300 W. Richards Street Douglas, Wyoming 82633, and in my capacity as the Attorney for Big Country Storage, LLC, we are making the following two (2) requests for federal agency records held by the U.S. EPA.

- I. The first request is for any and all information, reports, letters issued to, orders issued to, documents, emails, other forms of communication, including all communications with EPA Region 8, and the Wyoming specific branches of Wyoming DEQ and Wyoming EPA, and any other documentation the U.S. Environmental Protection Agency has regarding the following two entities:
 - 1) **Bonanza Earth Relocators, LLC** - A Wyoming Limited Liability Company. Its principal office is located at 15 Mountainview Road Douglas, Wyoming 82633. Gary Demaree is the owner. Peggy Schellinger is the registered agent. Ron Sekely is an employee.
 - 2) **North Park Transportation, Co.** - A foreign for profit Corporation, formed in Colorado, but doing business within the State of Wyoming. Its principal office is located at 5150 Columbine Street, Denver, Colorado 80216. North Park Transportation, Co has a Wyoming place of business located at 741 S. Riverbend Drive, Douglas, Wyoming 82633. Paul Kooi and Blaine I Burt are Directors. Keith Lilly is the President. Deanna Rusch is Treasurer and Vice President, Greg Walkup is also a Vice President. Russ Sohneman is the registered agent.

- II.** The second request is for any and all information, reports, letters issued regarding, orders issues regarding, documents, emails, other forms of communication, including all communications with EPA Region 8, and the Wyoming specific branches of Wyoming DEQ and Wyoming EPA, and any other documentation the U.S. Environmental Protection Agency has regarding the following diesel/gas fuel spill incident:

On March 26, 2021, it was discovered that approximately 500 gallons of diesel/gas fuel spilled or leaked out of a fuel tanker owned by Bonanza Earth Relocators, LLC which was parked at 741 S. Riverbend Drive in Douglas, Converse County, Wyoming. This location is identified by the following legal description: RIVERSIDE INDUSTRIAL PARK, LOT 8, Douglas, Converse County, Wyoming. This property is owned by North Park Transportation, Co. and on the date the spill was discovered the section of this property where the spill originated was leased to Bonanza Earth Relocators, LLC.

The fuel that spilled or leaked out of the fuel tanker flowed east, traversing approximately 200 feet of fence line on the property owned by North Park Transportation, Co. The fuel continued to flow in an easterly direction and crossed the property line onto land owned by Big Country Storage, LLC. The fuel then spread out and contaminated approximately 5,000 square feet of ground owned by Big Country Storage, LLC.

On March 26, 2021, the Douglas Police Department was notified of the fuel spill. Sergeant Schmidt and Officer Dowd from the Douglas Police Department responded to the call regarding the fuel spill. Pursuant to W.S. § 35-11-1421, the Douglas Police Department notified the following agencies of the spill: City of Douglas Code and Compliance Officer, the Wyoming Department of Environmental Quality, and the Converse Country Emergency Manager.

On March 31, 2021, Wyoming DEQ performed an initial, and limited site investigation. Brian Wood with Wyoming DEQ issued a Memorandum, dated April 1, 2021, regarding his findings.

On April 23, 2021, Joe Hunter, Emergency Response Coordinator with Wyoming DEQ, issued a letter to North Park Transportation, Co. regarding the fuel spill, which directed North Park Transportation, Co. with the duty to oversee the cleanup of the fuel spill, and to remove all contaminated soils from both North Park Transportation, Co.'s property and the property owned by Big Country Storage, LLC.

On August 4, 2021, Mr. Hunter sent an email to North Park Transportation, Co., in which he stated, "After review of the analytical report you provided, DEQ has determined that your property in Douglas, WY meets our standards for cleanup. No further cleanup is needed and DEQ considers



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this incident closed.” However, despite being instructed by Wyoming DEQ to clean up Big Country Storage, LLC’s property, North Park Transportation, Co did not engage in any cleanup of Big Country Storage, LLC’s property.

Please contact me at (307) 265-0700 or ascott@wpdn.net to discuss this further. Any and all documents may be mailed to me at 159 N. Wolcott St., Suite 400, Casper, Wyoming 82601, or sent electronically to my above noted email address.

Sincerely,

Alia T. Scott

Attorney for Big Country Storage, LLC

Enclosures: DEQ Memorandum, DEQ Emails, DEQ Letter